

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

KASHEEN SAMUELS,

a/k/a "Kash,"

a/k/a "JR,"

Defendant.

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**3500 PROTECTIVE ORDER**

S2 18 Cr. 306 (ER)

Upon the application of the United States of America, Audrey Strauss, United States Attorney for the Southern District of New York, by and through Christopher Brumwell, Mollie Bracewell, and Jessica Fender, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material"), and providing additional protections to a designated subset of the 3500 Material which has been classified as "Attorney's Eyes Only," (the "Attorney's Eyes Only 3500 Material"), made on consent of defense counsel, and based on the Court's independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or

when any appeal has become final; (2) the defense is precluded from disseminating any of the 3500 Material to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendant is precluded from taking any of the 3500 Material or any copies thereof (except for 3500 Material produced for law enforcement agents) with him into any jail facility, or possessing any of the 3500 Material or copies thereof (except for 3500 Material produced for law enforcement agents) in any jail facility, either before, during, or after trial; except that the defendant may review the 3500 Material in the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense.

IT IS FURTHER ORDERED that 3500 Materials produced with prefixes 3501, 3508, 3510, 3516, 3518, and 3520 have been designated "Attorney's Eyes Only 3500 Material." The 3500 Material with the prefixes 3501, 3510, and 3520 relate to cooperating witnesses, and the 3500 Material with the prefixes 3508, 3516, and 3518 relate to a victim witness. Such Attorney's Eyes Only 3500 Material, including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendant, and may be disclosed

only to defense counsel and to any paralegal or staff employed by the defense, until Wednesday, July 21, 2021, absent the Government, in its discretion, consenting in writing to remove the "Attorney's Eyes Only 3500 Material" designation prior to that date.

IT IS FURTHER ORDERED that the defendant, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity of the cooperating and victim witnesses referenced in the Attorney Eyes' Only 3500 Material until Wednesday, July 21, 2021.

Dated: New York, New York  
July 2, 2021

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written above a horizontal line.

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THE HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE